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July 12, 2023

By ECF

The Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, NY 805-0224

**Re: *Huatai Property & Casualty Ins. Co., Ltd. v. Air Sea Transport, Inc.,
Maersk A/S and BNSF Railway Company***
(Index No. 23-cv-03574-PGG)
HR File No. 35358

Dear Judge Gardephe,

This firm represents Plaintiff, Huatai Property & Casualty Ins. Co., Ltd. ("Huatai" or "Plaintiff") in this action. Plaintiff writes to request that the Initial Status Conference (Dkt. No 10), and corresponding date to submit a proposed case management plan, be adjourned to a date certain after August 28, 2023.

Pursuant to Your Honor's Individual Practice Rule 1(D), Plaintiff responds as follows:

- 1) The Initial Status Conference is presently scheduled for July 20, 2023, at 11:15 AM; the related proposed case management plan filing is due tomorrow;
- 2) Plaintiff requests an adjournment of the Initial Status Conference to a date certain after August 28, 2023;

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3) This is the first request for an adjournment of the Initial Status Conference by any party;

4) Reasons for current request: substantive settlement negotiations are currently underway with one named defendant. An adjournment is requested to facilitate final settlement discussions that counsel anticipates will occur in the next week or two. Plaintiff and one named defendant need more time to finalize the terms of the settlement and to effectuate payment of settlement proceeds, after which time Plaintiff may assign all claims it has against all entities to this settling defendant. An extension is also requested because none of the three defendants have formally appeared yet. Therefore, an Initial Status Conference, if needed, will be more efficient and productive, for all parties and the Court, after all defendants formally appear.

5) Whether the adversary consents: not applicable. No defendant has formally appeared yet.

Counsel for Plaintiff is available to address any questions or concerns the Court may have. We thanks the Court in advance for consideration of this request.

Respectfully submitted,

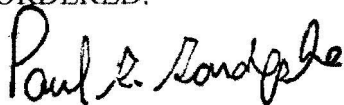
HILL RIVKINS LLP



Charles M. Henderson, III

MEMO ENDORSED: The conference is adjourned to August 23, 2023 at 10:00 a.m.

SO ORDERED.



Paul G. Gardephe
United States District Judge

Date: July 14, 2023